

EXHIBIT A

**Ratio of Frontier's Objections to Requests Served
Through March 24, 2022**

Type of Requests served on Frontier	Date Served	No. of Requests	No. Objected To	No. Including "vague" "ambiguous" "overly broad" or "unduly burdensome" objections	No. Including Relevance or Proportionality Objections, or "outside the scope of Fed.R.Civ.P. 26(b)(1)" objections
Interrogatories to Frontier (Joint 1 st)	10/7/2019	16	15	15	14
Req. for Prod. To Frontier (Joint 1 st)	10/7/2019	48	26	22	23
Req. for Prod. To Frontier (Joint 2 nd)	11/15/2019	7	7	0	7
Req. for Admissions to Frontier (Joint 1 st)	4/1/2020	28	24	0	24
Interrogatories to Frontier (P.D. 2 nd)	4/21/2020	2	1	0	1
Req. for Prod. To Frontier (P.D. 3 rd)	4/21/2020	3	3	0	0
Req. for Admissions to Frontier (Joint 2 nd)	4/21/2020	4	0	-	-
Req. for Prod. to Frontier (P.D. 4 th)	4/22/2020	3	3	2	3
Interrogatories to Frontier (A.D. 2 nd)	4/6/2021	4	3	1	1
Interrogatories to Frontier (P.D. 3 rd)	5/21/2021	5	1	0	1
Req. for Prod. to Frontier (P.D. 5 th)	5/21/2021	13	13	8	13

Interrogatories to Frontier (A.D. 3 rd)	8/19/2021	2	2	0	2
Req. for Prod. to Frontier (P.D. 6 th)	8/19/2021	10	2	2	2
Req. for Admissions to Frontier (Joint 3 rd)	10/28/2021	5	0	-	-
Req. for Prod. to Frontier (P.D. 7 th)	2/22/2022	34	34	32	32
Req. for Admissions to Frontier (Joint 4 th)	2/22/2022	16	16	16	16
Interrogatories (P.D. 4 th)	2/23/2022	1	1	1	1
TOTALS		201	151 (75%)	99 (66%)	140 (93%)